

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

FRANK QUAGLIA,

Plaintiff,

v.

**BRAVO NETWORK, NATIONAL
BROADCASTING COMPANY, INC.,
RAINBOW PROGRAMMING
HOLDINGS, INC. AND DOES 1-10,**

Defendants.

**CIVIL ACTION
NO. 04-10460-RWZ**

JOINT MOTION FOR EXTENSION OF DISCOVERY SCHEDULE

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, plaintiff Frank Quaglia ("Quaglia") and defendants Bravo Network, National Broadcasting Company, Inc. and Rainbow Media Holdings LLC (sued herein as Rainbow Programming Holdings, Inc.) (collectively, "defendants") jointly request that the June 2, 2004 Scheduling Order be amended to extend by sixty (60) days the dates for the close of fact and expert discovery and the deadlines for filing dispositive motions and any responsive papers.

Specifically, the parties request that: (1) the deadline for completing depositions of parties and fact witnesses and serving any supplemental documents requests be extended from December 1, 2004 to and including January 31, 2005; (2) the deadline for designating any expert witnesses and making expert disclosures be extended from December 15, 2004 to and including February 14, 2005; (3) the deadline for completion of expert witness depositions be extended from January 31, 2005 to and including April 1, 2005; (4) the deadline for filing dispositive motions be extended from March 2, 2005 to and including May 2, 2005; (5) the deadline for filing answer papers on dispositive motions be extended from April 1, 2005 to and including May 31, 2005; and (6) the deadline for reply papers on dispositive motions be extended from April 22, 2005 to and including June 21, 2005.

As grounds therefore, the parties state as follows:

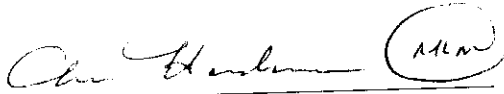
1. Counsel for the defendants and plaintiff have assented to the relief sought in this motion.
2. Amendment of the Scheduling Order is requested to provide the parties additional and adequate time to investigate, analyze, and pursue alternative strategies for resolving the litigation.
3. No prejudice to any party shall result from the requested amendment to the Scheduling Order.

WHEREFORE, the parties hereby move this Court to amend the Scheduling Order as proposed above.

Respectfully submitted,

FRANK QUAGLIA,

By his attorneys,



Chris Winton Henderson (BBO #655321)
57 Wharf Street
Suite No. 3A
Salem, MA 01970
978-741-4646

OF COUNSEL

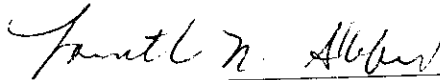
Neville L. Johnson
Douglas L. Johnson
JOHNSON & RISHWAIN LLP
12121 Wilshire Blvd.
Suite 1201
Los Angeles, California 90025-1175
310-826-2410

Date: November 12, 2004

**BRAVO NETWORK, NATIONAL
BROADCASTING COMPANY, INC.,
and RAINBOW MEDIA HOLDINGS
LLC (sued herein as RAINBOW
PROGRAMMING HOLDINGS, INC.),**

By their attorneys,

BINGHAM MCCUTCHEN LLP



Jonathan M. Albano, BBO #013850
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150 Federal Street
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OF COUNSEL

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Date: November 12, 2004

Nov 12 04 10:52a H. Drew Romanovitz 9787450261
11/11/2004 15:42 FAX 310 826 5450 JOHNSON & RISHWAIN LLP

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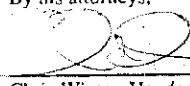
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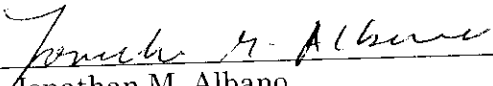
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Attorney for Bravo Company
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorneys of record for each other party by first-class mail on November 12, 2004.


Jonathan M. Albano